{In Archive} Response to R6-09-000-8448 Davis - Emission Limits For New and Existing Cement Kilns w/due date of June 17

Stephanie Kordzi to: Cynthia Fanning 06/16/2009 03:02 PM
Cc: Jeffrey Robinson, Margaret Oldham
Bcc: Stephanie Kordzi

From: Stephanie Kordzi/R6/USEPA/US
To: Cynthia Fanning/R6/USEPA/US@EPA
Cc: Jeffrey Robinson/R6/USEPA/US@EPA, Margaret Oldham/R6/USEPA/US@EPA
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Cindy,

Our proposed response to Senator Davis' inquiry is below. We understand that you will send it to her office. Thanks.

Margaret - please close out the control.

R6-09-000-8448 Davis New Emissions for New and Existing Cement Kilns.pdf

The Honorable Wendy Davis
The Senate of the State of Texas
Wendy.davis@senate.state.tx.us

Re: Proposed National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry; Proposed Rule, May 6, 2009

Dear Senator Davis:

We appreciated your time today, June 16, 2009, so that we could further discuss your letter of May 29, 2009, to the Environmental Protection Agency (EPA) Acting Regional Administrator Lawrence Starfield. Your letter requests that EPA Region 6 examine current and historical data on the emissions of Mercury, Particulate Matter, Total Hydrocarbons, and Hydrochloric Acid from the six Midlothian cement kilns to assess the impact of the proposed EPA requirements on their operations.

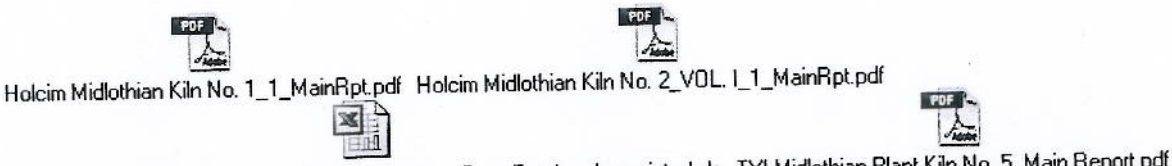
Pollutant emission data was collected at the six kilns and is included in the docket which supports the proposed rule. See http://www.regulations.gov/fdmspublic/component/main?main=DocketDetail&d=EPA-HQ-OAR-2002-0051. The information that was discussed today during our conversation is provided below.

Compliance will be required with emission rates for Mercury (43 lbs Hg/million tons of clinker), Particulate Matter (0.085 lbs PM/ton clinker, or soot, Hydrochloric Acid (2 ppmv), and chemicals contributing to smog called Total Hydrocarbons (7 ppmv). You requested that the emission data be compared to the proposed emission limits in the rule. However, the proposed emission limits will be developed based on specific, case-by-case information unique to a facility's individual operations in conjuction with the emission rates listed. Site specific parameters include characteristics such as volumetric flow rates of effluent gas and clinker production rate. The table below contains the Mercury emissions rates in lb/year for the Midlothian Kilns:

Ash Grove Texas, L.P.-Midlothian, TX	900 Gifco Road	Midlothian	TX	76065	1
Ash Grove Texas, L.P.-Midlothian, TX	900 Gifco Road	Midlothian	TX	76065	2
Ash Grove Texas, L.P.-Midlothian, TX	900 Gifco Road	Midlothian	TX	76065	3
Holcim US Inc.--Midlothian, TX	1800 Dove Lane	Midlothian	TX	76065	Kil
Holcim US Inc.--Midlothian, TX	1800 Dove Lane	Midlothian	TX	76065	Kil
TXI Operations, LP--Midlothian, TX	245 Ward Road	Midlothian	TX	76065	Kil

The TXI data is only for the large preheater/precalciner kiln 5.

Emission test report results:



The remaining information that we were able to pull from the docket follows:

1) For the 3 kilns at Ash Grove Texas, particulate matter is currently controlled through the use of electrostatic precipitators. Total hydrocarbons (THC) is controlled by following good combustion practices. We were unable to locate information regarding the control of hydrochloric acid.

2) For the 2 kilns at Holcim US, Mercury is controlled through the use of desulfization scrubbers.

3) For Kiln 5 at TXI, Mercury is controlled through the use of desulfization scrubbers. THC is controlled through the use of a regenerative thermal oxidizer. We also have information indicating that cement production at the TXI kiln is approximately 1.8 million tons per year.

Regarding the type of control technologies that may be utilized with a high degree of efficiency for controlling these pollutants, we are attaching an outline discussing current control

technologies demonstrating the control efficiencies listed for the pollutants in question. The preamble to the Federal Register also discusses these control technologies. See http://www.epa.gov/fedrgstr/EPA-AIR/2009/May/Day-06/a10206.pdf.

Projected Part 63 Subpart LLLControl Technologies.ppt